

EXHIBIT 38

**To
PLAINTIFF'S LOCAL RULE 56.1(b)(3)(C) STATEMENT OF ADDITIONAL FACTS
REQUIRING DENIAL OF THE CITY'S MOTION FOR PARTIAL SUMMARY
JUDGMENT**

March 15, 2016

Case No. 14-CV-4391

#	Name	Year Exonerated	Year Settled	Amount Paid	City	Race	Gender	Age
1	Melvin Jones	1989			Chicago	Black	Male	30
2	Joaquin Varela	1991			Chicago	Hispanic	Male	22
3	Emmaline Williams	1995			Chicago	Black	Female	43
4	David Bates	1996	2015	\$66,000	Chicago	Black	Male	18
5	Ronald Jones	1999	2003	\$2,200,000	Chicago	Black	Male	34
6	Hubert Geraldts, Jr	2000			Chicago	Black	Male	30
7	Marcellius Bradford	2001	2001	\$900,000	Chicago	Black	Male	17
8	Miguel Castillo	2001	2004	\$1,200,000	Chicago	Hispanic	Male	35
9	Calvin Ollins	2001	2006	\$1,500,000	Chicago	Black	Male	14
10	Eric Kittler	2002	2006	\$2,000,000	Chicago	Black	Male	15
11	Michael Evans	2003	2005	\$2,700,000	Chicago	Black	Male	17
12	Edar Duarte Santos	2003	2006	\$3,000,000	Chicago	Hispanic	Male	26
13	Luis Ortiz	2003	2006	\$3,000,000	Chicago	Hispanic	Male	18
14	Omar Aguirre	2003	2006	\$6,740,000	Chicago	Hispanic	Male	28
15	Stanley Howard	2003	2007	\$1,800,000	Chicago	Black	Male	21
16	Madison Hobley	2003	2007	\$7,800,000	Chicago	Black	Male	26
17	Aaron Patterson	2003	2007		Chicago	Black	Male	21
18	Leroy Orange	2003	2007	\$5,500,000	Chicago	Black	Male	32
19	Lafonso Rollins	2004	2006	\$9,000,000	Chicago	Black	Male	17
20	Dan Young	2005			Chicago	Black	Male	30
21	Harold Hill	2005	2011	\$1,250,000	Chicago	Black	Male	16
22	Robert Wilson	2006	2012	\$3,600,000	Chicago	Black	Male	41
23	James Andrews	2008	2009	\$1,800,000	Chicago	Black	Male	21
24	David Fauntleroy	2009	2009	\$1,800,000	Chicago	Black	Male	22
25	Ronald Kitchen	2009	2013	\$6,150,000	Chicago	Black	Male	22
26	Michael Tillman	2010	2012	\$5,375,000	Chicago	Black	Male	20
27	Eric Caine	2011	2013	\$10,000,000	Chicago	Black	Male	19
28	Harold Richardson	2012			Chicago	Black	Male	16
29	Michael Saunders	2012			Chicago	Black	Male	15
30	Terrill Swift	2012			Chicago	Black	Male	17
31	Vincent Thames	2012			Chicago	Black	Male	16
32	James Kluppelberg	2012			Chicago	Caucasian	Male	18
33	Carl Chatman	2013			Chicago	Black	Male	47
34	Daniel Taylor	2013			Chicago	Black	Male	17
35	Nicole Harris	2013			Chicago	Black	Female	23
36	Stanley Wrice	2013			Chicago	Black	Male	28
37	Alstory Simon	2014			Chicago	Black	Male	32
38	Deon Patrick	2014			Chicago	Black	Male	20
39	Lewis Gardner	2014			Chicago	Black	Male	15
40	Paul Phillips	2014			Chicago	Black	Male	17
41	Robert Britton	2014			Chicago	Black	Male	38
42	Wayne Washington	2015			Chicago	Black	Male	20